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Federal Communications Commission (FCC)
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PS Docket No. 07-114

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In the Matter of Wireless E911 Location Accuracy Requirements

Dear Commissioners,

Thank you for the opportunity to comment on an issue as critical as 911 caller location accuracy. I am writing in support of the wireless E911 location accuracy consensus plan proposed by the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), and wireless carriers Verizon, AT&T, Sprint and T-Mobile. As Sheriff of Marion County, I am responsible for the 911 center for Indianapolis. Thus, I know firsthand the importance of time and location when responding to an emergency call.

As Americans have increasingly turned to smartphones and cell phones in their day to day lives, the number of 911 calls from wireless devices has not surprisingly risen. Approximately 70 percent of 911 calls are made from wireless phones. Unlike landlines, calls from mobile devices are not tied to a specific location, making the need for a system that offers accurate dispatchable location information critical for 911 responders. The FCC recognizes the importance of this and the abovementioned roadmap gets us there.

APCO, NENA and the carriers propose using the universally tested Bluetooth and Wi-Fi technologies to send a dispatchable location, allowing first responders to know not just the building the call is coming from, but the specific apartment, floor, or suite. The plan also establishes a test bed with real-world conditions to get true results, and employs a timeframe that allows for thorough testing and continuous reporting to ensure success. Within six years, 80 percent of all Voice over LTE wireless 911 calls will include these advanced technologies.

Accurate location information for a wireless 911 caller is crucial to responding quickly to an emergency. The FCC has recognized the need for an enhanced system, and the consensus plan proposed by the public safety organizations and wireless companies is the best way to achieve that objective.

Thank you for your consideration.

Sincerely,

John R. Layton
Marion County Sheriff

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Enhanced 911 Indoor Location Accuracy – Summary

BACKGROUND:

When a wireless caller dials 911, the FCC requires that the caller's latitude and longitude information be transmitted to the local 911 center. This information must be provided within a minimum degree of accuracy and reliability, with compliance based on *outdoor* calls. Since 2011 the FCC has been considering new rules for indoor accuracy, including a requirement to provide a *vertical* location to the 911 call center for multi-story buildings. In February 2014, the FCC proposed rules with specific benchmarks, and also encouraged industry and public safety to work together to develop a consensus plan. In November 2014, industry and public safety announced such a plan, which well exceeds the FCC's proposals.

PROPOSED SOLUTION:

Verizon backs a new consensus plan to improve 911 indoor location accuracy. Over the next six years, years, proven technologies will be used to provide a specific indoor location to public safety. The plan was developed in concert with AT&T, Sprint and T-Mobile, as well as with public safety partners APCO and NENA.

KEY FEATURES OF THE PLAN:

- Uses **Wi-Fi and Bluetooth**, proven existing technologies that are already deployed, to determine a "dispatchable" location – a specific address that emergency personnel can be sent to. (FCC's plan did not include a dispatchable location.)
- Uses a test bed to verify technologies and vendor performance for indoor and outdoor technologies. The test bed is open, transparent and technology-neutral, and operates under real-world conditions.
- Uses an agreed upon timeline with ambitious milestones for demonstration, standards development, and implementation of database and handset capabilities:
    - 40% of all wireless 9-1-1 calls within two years
    - 50% of all wireless 9-1-1 calls within three years
    - 75% of all VoLTE wireless 9-1-1 calls within five years
    - 80% of all VoLTE wireless 9-1-1 calls within six years
- Improves existing location technologies for better outdoor and indoor location fixes. Uses technology-neutral solutions that don't rely on unproven promises of any particular vendor.

ALTERNATIVE PLANS:

The Find Me 911 Coalition. In 2013, location solution vendor TruePosition requested that the FCC promptly adopt new indoor accuracy rules, and spearheaded a Hill and FCC lobbying effort to support that position (the "Find Me 911 Coalition"). The coalition consists of various emergency personnel and first responders (http://findme911.org/coalition-members/). TruePosition offers its own technology that it claims can already be used for precise indoor location. However, its technology is unproven; locating a 911 caller should not depend on a single point of failure, such as single company or solution.